

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARIA STAPLETON, et al on behalf of themselves, individually, and on behalf of all others similarly situated, and on behalf of the advocate plan,

Plaintiffs,

v.

ADVOCATE HEALTH CARE NETWORK AND SUBSIDIARIES, ET AL.,

Defendants.

Civil Action No. 1:14-cv-01873

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT AGREEMENT**

Plaintiffs Maria Stapleton, Judith Lukas, Sharon Roberts, and Antwain Fox (“Named Plaintiffs”), by and through their attorneys, respectfully move the Court for an Order: (1) preliminarily approving the Class Action Settlement Agreement (“Settlement” or “Settlement Agreement”) between the Parties; (2) preliminarily certifying the proposed Settlement Class pursuant to Federal Rules of Civil Procedure 23(b)(1) and/or 23(b)(2); (3) approving the form and method of Class Notice; and (4) setting a date and time for a hearing (the “Fairness Hearing”) for consideration of final approval of the Settlement, of payment of attorneys’ fees and expenses, and of a potential Incentive Award to certain Plaintiffs.

Dated: February 16, 2018

Respectfully submitted,

KELLER ROHRBACK, L.L.P.

By /s/ Christopher Graver

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2018, I electronically filed the above with the Clerk of the Court using the CM/ECF system, which in turn sent notice to all counsel of record.

Dated: February 16, 2018

/s/ Christopher Graver
Christopher Graver